

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA**

AMANDA FEENSTRA, *et al.*,

Plaintiffs,

v.

JARED SIGLER, *et al.*,

Defendants.

**Case No.: 19-cv-234-JFH-CDL**

**UNOPPOSED MOTION TO EXTEND ALL DEADLINES**

Defendants State of Oklahoma *ex rel.* Oklahoma Indigent Defense System (“OIDS”), OIDS Executive Director Charles T. Laughlin,<sup>1</sup> and OIDS Board of Directors (hereinafter referred to as “OIDS Defendants”), pursuant to LCvR7-1(g), respectfully request an extension of all deadlines by sixty (60) days. In support of this motion, OIDS Defendants state:

1. The matter was initially filed in Washington County in March 2019 and removed to this Court on May 3, 2019. [Doc. 3].

2. Former counsel for OIDS Defendants, Jon Williford, left the Office of the Attorney General on June 4, 2021 and therefore this Court granted permission to substitute current counsel, Jacqueline R. (Zamarripa) Clayton, as counsel of record. [Docs. 122, 123]

3. Upon review of the record, the parties have requested several extensions of deadlines, but relevant to this request are two prior joint motions to extend deadlines by sixty (60) days [Docs. 78, 79, 95, 96] and a joint motion to extend summary judgment briefing and reset interim pre-trial deadlines. [Docs. 105, 107].

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<sup>1</sup> As of February 2021, Charles T. Laughlin became the Executive Director of OIDS and will be substituted for Craig Sutter regarding the remaining official capacity claim against him, pursuant to Fed. R. Civ. P. 25.

4. The operative Amended Scheduling Order in this matter was entered on March 9, 2021. [Doc. 108].

5. The current deadlines in this matter are as follows:

<b>Deadline</b>	<b>Due Date</b>
Pretrial Disclosures and Exchange of Pre-marked exhibits	8/9/2021
Pretrial Conference	8/23/2021
Trial Briefs and Exchange of Demonstrative Exhibits	9/8/2021
Trial Date	9/20/2021

6. Counsel for OIDS Defendants has conferred with all parties and all parties do not object to an extension of the deadlines as set forth in Amended Scheduling Order, Doc. 108, by sixty (60) days.

7. Pursuant to Fed. R. Civ. P. 16, as good cause underlying this request for extension, OIDS Defendants would show as follows:

- a. OIDS Defendants' former attorney, Jon Williford, withdrew from this case on June 4, 2021, three months before trial, with Mrs. Clayton continuing as OIDS Defendants' counsel. Such withdrawal could not have been foreseen at the time the Amended Scheduling Order in this matter was entered.
- b. While OIDS Defendants' counsel has endeavored to keep the previously-existing scheduling orders, doubling the work load to review this matter has caused delay in settlement discussions. Counsel is optimistic that this matter can be settled with Plaintiffs' counsel.

- c. In the alternative, the requested extension should allow OIDS Defendants' counsel appropriate time to properly prepare this matter for trial. The parties have been assigned to this matter for well over two years, sixty (60) additional days will allow new counsel to determine appropriate trial exhibits, final witness and exhibit lists, and prepare for pretrial disclosures pursuant to Fed. R. Civ. P. 26(a)(3).
- d. Counsel for OIDS Defendant's office has undergone several staffing changes resulting in increased caseloads, in addition to handling post pandemic discovery and reset hearings on multiple cases.
- e. Counsel for OIDS Defendants will also be out of the country the week before the trial for this matter is currently set. [Doc. 108]. Counsel's honeymoon travel was planned well before reassignment of this case and while counsel has tried to change travel arrangements, counsel is unable to accommodate such change at this time.

8. Should the requested extension be granted, the new deadlines would be as follows:

<b>Deadline</b>	<b>Due Date</b>
Pretrial Disclosures and Exchange of Pre-marked exhibits	10/8/2021
Pretrial Conference	10/22/2021
Trial Briefs and Exchange of Demonstrative Exhibits	11/8/2021
Trial Date	11/19/2021

9. This extension request is not being sought for the purpose of delay.

WHEREFORE, OIDS Defendants respectfully request the Court grant the requested extension of all deadlines by sixty (60) days.

Respectfully submitted,

/s/ Jacqueline R. (Zamarripa) Clayton

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**CERTIFICATE OF SERVICE**

This is to certify that on the 23<sup>rd</sup> day of July 2021, I electronically transmitted the attached document to the Clerk of the Court and registered users using the ECF Filing System.

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